

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 04-11578PBS

FIREMAN'S FUND INSURANCE)
COMPANY)
As Subrogee of Hodan Properties, Inc.)
777 Marin Drive)
Novado, California 94998)
Plaintiff,)
vs.)
FIRE SYSTEMS, INC.,)
FIRE SUPPRESSION SYSTEMS OF)
NEW ENGLAND, INC., PRO CON,)
INC., and BRIERE & PAQUETTE, INC.))
f/k/a PAQUETTE ELECTRIC CO, INC.))
Defendants)

ASSENTED-TO MOTION TO EXTEND DISCOVERY DEADLINE

The defendant, Fire Suppression Systems of New England, Inc., with the assent of the plaintiff, Fireman's Fund Insurance Company and defendants, Fire Systems, Inc., Pro Con, Inc. and Briere & Paquette, Inc. f/k/a Paquette Electric Co, Inc., hereby respectfully request this Honorable Court to extend the discovery deadline for four months which would permit the parties to conduct discovery until October 15, 2005 and extend the dates thereafter in the Tracking Order accordingly.

1. The additional time requested is necessary for the parties to complete depositions and to conclude discovery between all of the parties, as well as conduct discovery that may be necessary as a result of the deposition testimony and to properly prepare their case for trial and/or settlement.

2. The parties have been working cooperatively in this matter.
3. It would be consistent with the interests of justice and the orderly administration and utilization of this Court's resources to allow this extension.

Accordingly, the defendant, Fire Suppression Systems of New England, Inc., with the assent of the plaintiff and defendants, request this Honorable Court extend the discovery deadline in this case up to and including October 15, 2005 and to extend the dates thereafter in the Tracking Order accordingly.

The defendant,

Fire Suppression Systems of
New England, Inc.
By its attorneys,

/s/Jocelyn M. Sedney
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Dated: June 14, 2005